



January 7, 2022

David Albright
Manager, Groundwater Protection Section
United States Environmental Protection Agency Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Re: Response to Administrative Review – Notice of Incomplete Application
Underground Injection Control (UIC) Permit Application
Class VI Pre-Construction Permit Application No. R9UIC-CA6-FY22-2

Dear Mr. Albright:

Daniel B. Stephens & Associates, Inc. (DBS&A) has prepared this response to the U.S. Environmental Protection Agency Region IX (“EPA”) San Joaquin Renewables (SJR) Class VI Permit Application Completeness Evaluation in your letter dated December 3, 2021. All requested materials have been uploaded to the Geologic Sequestration Data Tool (GSDT).

EPA COMMENT: General Application Information

- Please provide in the permit application narrative the physical address and location (township-range-section and latitude-longitude) of the proposed McFarland injection facility.
- Please provide in the permit application narrative up to four Standard Industrial Classification (SIC) codes for the facility.
- Please indicate in the permit application narrative whether the facility will be located on Indian lands.
- Please give a name to the proposed injection well in the permit application narrative.
- Please characterize in the permit application narrative the state (gas, liquid, or supercritical) of the carbon dioxide stream proposed for injection.

RESPONSE: Each requested item was added to the Narrative Permit Application Report, revised version January 7, 2022 uploaded to the GSDT. Physical address, location, status regarding Indian lands, and SIC code were added to Section 1.1 (first paragraph). Injection well name was specified to be SJR-I1 and this was added to Section 1.2 (third paragraph) and Section 3.3. Carbon dioxide phase state was specified in Section 1.2 (third paragraph) and new Appendix B (carbon dioxide phase study) was added.

EPA COMMENT: Considerations of Specific Federal Laws.

40 CFR §144.4 requires that EPA consider the potential applicability of several specific Federal Laws, including the Wild and Scenic Rivers Act (WSRA), National Historic Preservation Act (NHPA), Endangered Species Act (ESA), Coastal Zone Management Act (CZMA), and the Fish and Wildlife Conservation Act (FWCA). To expedite our consideration of these laws, please

Daniel B. Stephens & Associates, Inc.

43 Randolph Road, #129 (301) 755-6270

Silver Spring, Maryland 20904

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describe how the proposed project will satisfy applicable requirements under these Federal Laws. For the ESA and NHPA, we have included some guidance below to assist you with obtaining the required information.

RESPONSE: TSS Consultants has prepared a report dated December 30, 2021 that responds to EPA's requested information, and the report is uploaded to the GSDT.

EPA COMMENT: Consideration of Well Stimulation Program

40 CFR §146.88(a) requires that all stimulation programs be approved by the EPA Director as part of the permit application and incorporated into the permit. If the initial permit does not include a stimulation program and the operator identifies a need for well stimulation later on in the life of the project, a major permit modification would be necessary. EPA suggests that SJR consider preparing and including a proposed well stimulation program in the permit application. A generic stimulation program may be used for the pre-construction phase of the project.

RESPONSE: Driltek has prepared a Well Stimulation Program dated January 6, 2022 and it is uploaded to the GSDT.

EPA COMMENT: Quality Assurance and Surveillance Plan

40 CFR §146.90(k) requires that the applicant submit a Quality Assurance and Surveillance Plan (QASP) for all testing and monitoring activities. Please prepare and include a QASP in the permit application.

RESPONSE: DBS&A has prepared a QASP dated January 7, 2022 and it is uploaded to the GSDT.

Sincerely,

DANIEL B. STEPHENS & ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read 'G. Schnaar', with a long horizontal line extending to the right.

Gregory Schnaar, Ph.D., PG (VA)
Principal Environmental Scientist